INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

January 23, 2004

TO: Interested Parties / Applicant

RE: Trelleborg Automotive Peru Division / 103-18054-00021

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER- MOD.dot 9/16/03

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January 23, 2004

Mr. Michael Burk
Trelleborg Automotive Peru Division
2935 West 100 North
Peru, Indiana 46970

Re: **103-18054**
Minor Source Modification to:
Part 70 Operating Permit No.: **T 103-7638-00021**

Dear Mr. Burk:

Trelleborg Automotive Peru Division was issued Part 70 Operating Permit T 103-7638-00021 on June 30, 1999 for a fabricated rubber products manufacturing operation. An application to modify the source was received on October 6, 2003. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

(a) One (1) spray booth, identified as Paasche spray booth, using high-volume, low-pressure (HVLP) spray applicators, equipped with dry filters for particulate control, exhausting to Stack 10, capacity: 3,300 parts per hour. The parts are made of both rubber and metal, but are less than fifty percent (50%) metal.

(b) Thirteen (13) 300-ton rubber injection molding presses, capacity: 53 pounds of rubber per hour, each.

(c) One (1) 800-ton rubber injection molding press, capacity: 79.6 pounds of rubber per hour.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The source may begin construction when the minor source modification has been issued. Operating conditions shall be incorporated into the Part 70 Operating Permit as a significant permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter contact Edward A. Longenberger, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395, ext. 20 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,
Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
EAL/MES
cc: File - Miami County
Miami County Health Department
Air Compliance Section Inspector - Dave Rice
Compliance Branch - Karen Ampil
Administrative and Development
Technical Support and Modeling - Michele Boner

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MINOR SOURCE MODIFICATION
PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Trelleborg Automotive Peru Division
U.S. Highway 31 and 100 North
Peru, Indiana 46970

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

First Minor Source Modification No. 103-18054-00021	Sections Affected: A.2 and D.4
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: January 23, 2004

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary fabricated rubber products manufacturing operation.

Responsible Official:	Gregory K. Finch
Source Address:	U.S. Highway 31 and 100 North, Peru, Indiana 46970
Mailing Address:	R.R. 6, Box 631, Peru, Indiana 46970
Phone Number:	219-434-9800
SIC Code:	3069
County Location:	Miami
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) rubber/metal coating operation, identified as EU-001, constructed in 1991 and 1998, consisting of one (1) rollcoater, one (1) high volume, low pressure (HVLP) primer spray booth, one (1) high volume, low pressure (HVLP) adhesive spray booth, and three (3) electric infrared ovens, with maximum capacity of 3,600 parts per hour, 1,800 parts per hour, and 1,800 parts per hour, respectively, the one (1) primer spray booth and the one (1) adhesive spray booth, using dry filters for particulate matter control, each exhausting to one (1) stack (S114, S1, and S2);

(b) One (1) rubber and metal coating operation, identified as EU-002, constructed in 1991 and 1993, consisting of two (2) rollcoaters, each with maximum capacity of 515 parts per hour, exhausting to one (1) stack (S105);

(c) One (1) rubber and metal coating operation, identified as EU-003, constructed in 1991, consisting of two (2) air atomized spray booths, with maximum capacity of 250 parts per hour, using dry filters for particulate matter control, each exhausting to one (1) stack (S102 and S103);

(d) One (1) cryogenic deflasher capable of treating 2,200 pounds per hour of rubber parts;

(e) One (1) mill room which includes: one (1) carbon black handling system, one (1) mix oil handling system and one (1) Shaw mixer, capable of handling 3,500 pounds per hour of materials (carbon black and mixing oil).

(f) One (1) dip coater, used for applying coatings onto metal truck parts.

(g) One (1) spray booth, identified as Paasche spray booth, using high-volume, low-pressure (HVLP) spray applicators, equipped with dry filters for particulate control, exhausting to Stack 10, capacity: 3,300 parts per hour. The parts are made of both rubber and metal, but are less than fifty percent (50%) metal.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) One (1) natural gas fired boiler, with maximum heat input capacity of 1.67 million British thermal units per hour (mmBtu/hr);

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(f) One (1) dip coater, used for applying coatings onto metal truck parts.

(g) One (1) spray booth, identified as Paasche spray booth, using high-volume, low-pressure (HVLP) spray applicators, equipped with dry filters for particulate control, exhausting to Stack 10, capacity: 3,300 parts per hour. The parts are made of both rubber and metal, but are less than fifty percent (50%) metal.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Miscellaneous Metal Coating Operations [326 IAC 8-2-9]

The one (1) dip coater and the one (1) spray booth are not subject to 326 IAC 8-2-9 since the volatile organic compound (VOC) emissions are each less than 15 pounds per day before controls. Any change or modification which increases the VOC emissions to 15 pounds per day or more from either facility must be approved by the Office of Air Quality (OAQ) before such change may occur.

D.4.2 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart MMMM] [40 CFR 63.3901]

(a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart MMMM. The Permittee must comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.4.3 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart MMMM] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]

(a) The provisions of 40 CFR Part 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the U.S. EPA Air Toxics Website at **http://www.epa.gov/ttn/atw/misc/miscpg.html**. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after the date 3 years after the effective date of 40 CFR Part 63, Subpart MMMM.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

(c) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs

(b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).

(1) All coating operations as defined in 40 CFR 63.3981;

(2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

(3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and

(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

(d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, and are applicable to the affected source.

Compliance Determination Requirements

There are no compliance determination requirements applicable to these emission units.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.4 Notification Requirements [40 CFR 63.3910]

(a) General. The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).

(b) Initial notification. The Permittee must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart MMMM.

(c) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

D.4.5 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart MMMM, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.

(b) The significant permit modification application shall be submitted no later than twenty-seven months after the effective date of 40 CFR 63, Subpart MMMM.

(c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality

100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70
Minor Source Modification and a Significant Permit Modification

Source Background and Description

Source Name:	**Trelleborg Automotive Peru Division**
Source Location:	**2935 West 100 North, Peru, Indiana 46970**
County:	**Miami**
SIC Code:	**3069**
Operation Permit No.:	**T 103-7638-00021**
Operation Permit Issuance Date:	**June 30, 1999**
Minor Source Modification No.:	**103-18054-00021**
Significant Permit Modification No.:	**103-18267-00021**
Permit Reviewer:	**Edward A. Longenberger**

The Office of Air Quality (OAQ) has reviewed a modification application from Trelleborg Automotive relating to the construction of the following emission units and pollution control devices:

(a) One (1) spray booth, identified as Paasche spray booth, using high-volume, low-pressure (HVLP) spray applicators, equipped with dry filters for particulate control, exhausting to Stack 10, capacity: 3,300 parts per hour. The parts are made of both rubber and metal, but are less than fifty percent (50%) metal.

(b) Thirteen (13) 300-ton rubber injection molding presses, capacity: 53 pounds of rubber per hour, each.

(c) One (1) 800-ton rubber injection molding press, capacity: 79.6 pounds of rubber per hour.

History

Trelleborg Automotive was issued a Part 70 Operating Permit (T 103-7638-00021) on June 30, 1999. On October 6, 2003, Trelleborg Automotive submitted an application to the OAQ requesting to add one (1) spray booth and fourteen (14) rubber injection molding presses to their existing plant. This equipment was previously permitted at the Trelleborg Automotive plant in Logansport, Cass County, Indiana and are being moved to the Peru plant.

Each of the rubber injection molding presses are independent processes, and are classified as insignificant activities because the potential VOC emissions from each press are less than three (3) pounds per hour and fifteen (15) pounds per day. There are no state or federal rules applicable to the rubber injection molding presses. As such, the presses will not appear in the revised permit document.

The one (1) spray booth is subject to the newly promulgated NESHAP, 40 CFR 63, Subpart MMMM (National Emission Standard for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products), because the booth coats metal parts and is located at a major source of HAPs.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
Stack 10	Paasche spray booth	23.0	1.5	3800	70

Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification and Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on October 6, 2003. Additional information was received on November 10, 2003.

Emission Calculations

See pages 1 and 2 of 2 of Appendix A of this document for detailed emissions calculations.

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.020
PM_{10}	0.020
SO_2	-
VOC	5.98
CO	-
NO_X	-

HAPs	Potential To Emit (tons/year)
Worst case single HAP (Acetophenone)	1.48
TOTAL HAPs	1.97

Justification for Modification

The Part 70 Operating Permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(6), because the modification is subject to a national emission standard for hazardous air pollutants (NESHAP) (40 CFR 63, Subpart MMMM). The proposed operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification (SPM 103-18267-00021) in accordance with 326 IAC 2-7-12(b)(1)(E) and 326 IAC 2-7-12(d)(1). The Significant Permit Modification will give the source approval to operate the proposed emission units.

County Attainment Status

The source is located in Miami County.

Pollutant	Status
PM_{10}	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Miami County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Miami County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	28.6
PM_{10}	28.4
SO_2	0.100
VOC	152
CO	2.8
NO_X	13.1

(a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.

(b) These emissions are based upon the Technical Support Documents for previous IDEM, OAQ approvals (permit numbers 7638, 9550, 14336 and 15982)

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit (tons/year)						
Process/facility	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
Proposed Modification	0.003	0.003	-	5.98	-	-	1.97
PSD Threshold Level	250	250	250	250	250	250	-

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability

(a) This significant permit modification does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 with the potential to emit before controls equal to or greater than the major source threshold for any criteria pollutant. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this modification.

(b) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

(c) The miscellaneous metal parts surface coating operation is subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR Part 63, Subpart MMMM), Surface Coating of Miscellaneous Metal Parts and Products. The one (1) spray booth, identified as Paasche spray booth, is considered an existing affected source pursuant to 40 CFR 63.3882. The U.S. EPA Administrator has signed and will publish a final Maximum Achievable Control Technology Standard (MACT) at 40 CFR 63, Subpart MMMM for Surface Coating of Miscellaneous Metal Parts and Products. A copy of the signed version of the MACT is currently available on the U.S. EPA website, http://www.epa.gov/ttn/oarpg/t3pfpr.html, and will be published in the *Federal Register*.

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the affected source described in this section except when otherwise specified in 40 CFR 63 Subpart MMMM.

This rule has a future compliance date; therefore, the specific details of the rule and how the Permittee will demonstrate compliance are not provided in the permit. The Permittee shall submit an application for a significant permit modification nine (9) months prior to the compliance date for the MACT that will specify the option or options for the emission limitations and standards and methods for determining compliance chosen by the Permittee. At that time, IDEM, OAQ will include the specific details of the rule and how the Permittee will demonstrate compliance. In addition, pursuant to 40 CFR 63, Subpart MMMM, the Permittee shall submit:

(1) An Initial Notification containing the information specified in 40 CFR 63.9(b)(2) no later than one (1) year after the effective date of 40 CFR 63, Subpart MMMM.

(2) A Notification of Compliance Status containing the information required by 40 CFR 63.9(h) in accordance with 40 CFR 63.3910(c). The Notification of Compliance Status must be submitted no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.3940, 40 CFR 63.3950, or 40 CFR 63.3960 that applies to your affected source.

State Rule Applicability - Individual Facilities

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source is not one of the 28 listed source categories under 326 IAC 2-2, and the potential emissions of each criteria pollutant are less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 do not apply, and this source is a minor source with respect to this rule.

326 IAC 2-4.1 (New source toxics control)

The potential HAPs emissions from this modification are less than ten (10) tons per year of any single HAP, and less than twenty-five (25) tons per year of total HAPs. Therefore, the requirements of 326 IAC 2-4.1 do not apply.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(b)(15), the requirements of 326 IAC 6-3-2 are not applicable to the one (1) Paasche spray booth, since the booth uses less than five (5) gallons of coating per day.

326 IAC 8-1-6 (New facilities; general reduction requirements)

The requirements of 326 IAC 8-1-6 are not applicable to the proposed spray booth because the potential VOC emissions from the booth are less than twenty-five (25) tons per year.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

The requirements of 326 IAC 8-2-9 are not applicable to the one (1) spray booth, identified as Paasche spray booth, because the process uses less than fifteen pounds of VOC per day. Any change or modification that would increase VOC usage to fifteen (15) pounds per day or more, shall require prior IDEM, OAQ approval.

State Rule Applicability - Insignificant Activities

326 IAC 8-1-6 (New facilities; general reduction requirements)

The requirements of 326 IAC 8-1-6 are not applicable to the insignificant rubber injection molding machines because, even though each machine is a parallel and independent process, the potential VOC emissions from all of the machines combined are still less than twenty-five (25) tons per year.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no compliance monitoring conditions applicable to the proposed modification.

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in **bold**):

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) rubber/metal coating operation, identified as EU-001, constructed in 1991 and 1998, consisting of one (1) rollcoater, one (1) high volume, low pressure (HVLP) primer spray booth,

one (1) high volume, low pressure (HVLP) adhesive spray booth, and three (3) electric infrared ovens, with maximum capacity of 3,600 parts per hour, 1,800 parts per hour, and 1,800 parts per hour, respectively, the one (1) primer spray booth and the one (1) adhesive spray booth, using dry filters for particulate matter control, each exhausting to one (1) stack (S114, S1, and S2);

(b) One (1) rubber and metal coating operation, identified as EU-002, constructed in 1991 and 1993, consisting of two (2) rollcoaters, each with maximum capacity of 515 parts per hour, exhausting to one (1) stack (S105);

(c) One (1) rubber and metal coating operation, identified as EU-003, constructed in 1991, consisting of two (2) air atomized spray booths, with maximum capacity of 250 parts per hour, using dry filters for particulate matter control, each exhausting to one (1) stack (S102 and S103);

(d) One (1) cryogenic deflasher capable of treating 2,200 pounds per hour of rubber parts;

(e) One (1) mill room which includes: one (1) carbon black handling system, one (1) mix oil handling system and one (1) Shaw mixer, capable of handling 3,500 pounds per hour of materials (carbon black and mixing oil).

(f) One (1) dip coater, used for applying coatings onto metal truck parts.

(g) One (1) spray booth, identified as Paasche spray booth, using high-volume, low-pressure (HVLP) spray applicators, equipped with dry filters for particulate control, exhausting to Stack 10, capacity: 3,300 parts per hour. The parts are made of both rubber and metal, but are less than fifty percent (50%) metal.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(f) One (1) dip coater, used for applying coatings onto metal truck parts.

(g) One (1) spray booth, identified as Paasche spray booth, using high-volume, low-pressure (HVLP) spray applicators, equipped with dry filters for particulate control, exhausting to Stack 10, capacity: 3,300 parts per hour. The parts are made of both rubber and metal, but are less than fifty percent (50%) metal.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Miscellaneous Metal Coating Operations [326 IAC 8-2-9]

The one (1) dip coater ~~This emission unit~~ **and the one (1) spray booth are** ~~is~~ not subject to 326 IAC 8-2-9 since the volatile organic compound (VOC) emissions are **each** less than 15 pounds per day before controls. Any change or modification which increases the VOC emissions to 15 pounds per day or more from **either** ~~this~~ facility must be approved by the Office of Air Quality (OAQ) before such change may occur.

D.4.2 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart MMMM] [40 CFR 63.3901]

(a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart MMMM. The Permittee must comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.4.3 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart MMMM] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]

(a) The provisions of 40 CFR Part 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at http://www.epa.gov/ttn/atw/misc/miscpg.html. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after the date 3 years after the effective date of 40 CFR Part 63, Subpart MMMM.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

(c) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).

(1) All coating operations as defined in 40 CFR 63.3981;

(2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

(3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and

(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

(d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, and are applicable to the affected source.

Compliance Determination Requirements

~~D.4.2 Testing Requirements [326 IAC 2-7-6(1),(6)]~~

~~The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.~~

There are no compliance determination requirements applicable to these emission units.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

~~D.4.3 Record Keeping Requirements~~

~~There are no specific record keeping requirements for this facility.~~

~~D.4.4 Reporting Requirements~~

~~There are no specific reporting requirements for this facility.~~

D.4.4 Notification Requirements [40 CFR 63.3910]

(a) General. The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).

(b) Initial notification. The Permittee must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart MMMM.

(c) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

D.4.5 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart MMMM, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.

(b) The significant permit modification application shall be submitted no later than twenty-seven months after the effective date of 40 CFR 63, Subpart MMMM.

(c) The significant permit modification application shall be submitted to:

**Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015**

Conclusion

The construction and operation of this proposed modification shall be subject to the conditions of the attached Part 70 Minor Source Modification No. 103-18054-00021 and proposed Significant Permit Modification No. 103-18267-00021.

Appendix A: Emissions Calculations
VOC, HAP and Particulate
From Surface Coating Operations

Company Name: Trelleborg Automotive Peru Division
Address City IN Zip: 2935 West 100 North, Peru, Indiana 46970
Permit Number: 103-18054
Plt ID: 103-00021
Reviewer: Edward A. Longenberger
Date: October 6, 2003

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Carco Ink SG1280	9.2	80.00%	0.0%	80.0%	0.0%	18.00%	0.000003	3,300.00	7.36	7.36	0.07	1.75	0.32	0.02	40.89	75%

PM Control Efficiency: 85.00%

State Potential Emissions **Add worst case coating to all solvents**

Uncontrolled	**0.073**	**1.75**	**0.319**	**0.020**	
Controlled	**0.073**	**1.75**	**0.319**	**0.003**	

HAP Emissions

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Volatiles (H2O and Organics)	Weight % MIBK	MIBK Emissions (ton/yr)	lb HAP/ lb coating
Carco Ink SG1280	9.2	0.000003	3,300.00	80.00%	25.00%	0.100	1.250
					Total	**0.100**	

METHODOLOGY
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used
HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
VOC and HAPs
From Insignificant Injection Molding Operations

Company Name: **Trelleborg Automotive Peru Division**
Address City IN Zip: **2935 West 100 North, Peru, Indiana 46970**
Permit Number: **103-18054**
Plt ID: **103-00021**
Reviewer: **Edward A. Longenberger**
Date: **October 6, 2003**

300 ton rubber injection molding presses

Pollutant	Molding Capacity (lbs/hr)	Emission Factor (lb/lb)	Each press: Potential Emissions (lbs/hr)	Each press: Potential Emissions (lbs/day)	Each press: Potential Emissions (tons/yr)	Total for thirteen presses: Potential Emissions (lbs/hr)	Total for thirteen presses: Potential Emissions (lbs/day)	Total for thirteen presses: Potential Emissions (tons/yr)
VOC	53	1.680E-03	0.089	2.137	0.390	1.158	27.780	5.070
Worst Case Single HAP (Acetophenone)	53	4.400E-04	0.023	0.560	0.102	0.303	7.276	1.328
Total HAPs	53	5.543E-04	0.029	0.705	0.129	0.382	9.165	1.673

800 ton rubber injection molding press

Pollutant	Molding Capacity (lbs/hr)	Emission Factor (lb/lb)	Potential Emissions (lbs/hr)	Potential Emissions (lbs/day)	Potential Emissions (tons/yr)
VOC	79.6	1.680E-03	0.134	3.209	0.586
Worst Case Single HAP (Acetophenone)	79.6	4.400E-04	0.035	0.841	0.153
Total HAPs	79.6	5.543E-04	0.044	1.059	0.193